

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America)

v.)

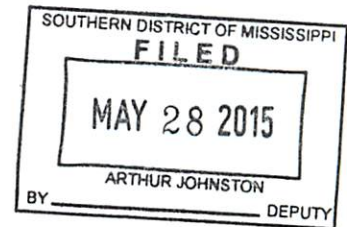
Case No.)

David Cooper)

and)

Regina Cooper)

Defendant(s))



1:15mj I 3

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 25, 2014 in the county of Harrison in the
Southern District of MS, Southern Division, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit, schedules I and IV controlled substances.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

A handwritten signature in blue ink, appearing to read "Ian Estorffe".

Complainant's signature

Ian Estorffe, HSI Task Force Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/28/2015City and state: Gulfport, MS

A handwritten signature in blue ink, appearing to read "John C. Gargiulo".

Judge's signature

John C. Gargiulo, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF HARRISON

I, Ian Estorffe, being first duly sworn, hereby depose and say that:

1. Affiant, Ian Estorffe, is an Agent with the Mississippi Bureau of Narcotics and has been employed as a sworn Agent by the Mississippi Bureau of Narcotics, (MBN) for approximately ten (10) years. Agent Ian Estorffe has been a full time law enforcement officer for approximately twenty (20) years with sixteen (16) of experience specializing in advanced narcotics investigations. Agent Estorffe has also been assigned to a Homeland Security Investigations Task Force located in Gulfport, Mississippi since 2012. Agent Estorffe is a graduate of the Acadiana Law Enforcement Academy located in Lafayette, Louisiana, and a graduate of the Mississippi Law Enforcement Officers Training Academy located in Pearl, Mississippi. Agent Estorffe has over one hundred and twenty college credits from Southeastern Louisiana University located in Hammond, Louisiana, (Criminal Justice Major). Agent Estorffe has also received advanced training in narcotics investigations from the Regional Counter-Drug Training Academy located in Meridian, Mississippi. Agent Estorffe has attended hundreds of classes and schools specializing in advanced narcotics investigations and apprehension of drug violators. Agent Estorffe has been a lead case Agent for hundreds of narcotics investigations and participated in thousands of narcotics investigations. During his tenure as a narcotics investigator, Agent Estorffe has participated in numerous undercover operations which have led to the imprisonment of hundreds of lower, middle and upper level drug violators in the State of Mississippi. Each case was prosecuted accordingly, which resulted in lengthy sentencing for each violator as well as other co-conspirators involved in the investigation. Agent Estorffe has participated in investigations which have targeted the highest levels of drug violators in the State of Mississippi utilizing advanced electronic intercept techniques, interviews, long term surveillance as well as basic investigative skills. These investigations resulted in the dismantling of significant drug trafficking organizations and the arrest and prosecution of its members. Agent Estorffe has also been a lead case Agent involving large scale Federal and State cases involving the arrest and prosecution of hundreds individuals distributing illegal narcotics. Agent Estorffe has been an affiant to hundreds affidavits and search/seizure warrants for residences, property, vehicle and electronic devices. Agent Estorffe has testified in Local, State and Federal court. Agent Estorffe has also been certified as an expert witness for court purposes involving narcotics investigations. Based on Agent Estorffe's investigations, MBN has obtained significant seizures of monies and other ill-gotten gains such as vehicles and real property.
2. On May 25, 2014, Dept. of Homeland Security United States Customs and Border Protection J.F.K. International Airport mail facility seized a package coming from India containing a white substance that tested positive for Methamphetamine. The shipper on the package was listed as: Kamlesh Pandey, Pandey Niwas Arti Colony, Near Saint Thersa School Kathgodam, Haldwani 263139 India. The receiver of the package was listed as: David Cooper at [REDACTED] Gulfport, MS 39502. The white substance was sent to the Department of Homeland Security US Customs and Border Protection Laboratories and Scientific Services for testing. Laboratory analysis determined the presence of Mephedrone, a scheduled controlled substance (Schedule I): Net weight was 97.4 grams.

3. On May 29, 2014, Homeland Security Investigations, United States Postal Inspection Service, and Mississippi Bureau of Narcotics conducted a controlled delivery of the May 25, 2014 mail seizure to [REDACTED], Gulfport, MS. Postal Inspector Robert Gechijian delivered the package to the residence, which was accepted at the front door by David Cooper. Regina Cooper was also present and found to reside at that residence. Upon acceptance of the package, Mississippi Bureau of Narcotics conducted a state search warrant at said residence. The following substances, among others, were seized from residence and are listed according to name and weight as determined by the Department of Homeland Security US Customs and Border Protection Laboratories and Scientific Services and the Mississippi Crime Laboratory:
 1. 1.0 gram of Alprazolam (Schedule IV)
 2. .39 grams of Methyllone and Dimethyllone (bk-MDDMA) (Schedule I)
 3. 5.5 grams of 25c-NBOMe, Pentadone and 4-Methyl-N-ethylicathinone (4-MEC) (Schedule I)
 4. 32.7 grams of 3,4-Methylenedioxymethamphetamine HC1 (MDMA) (Schedule I)
 5. 15.9 grams of Pentadone with trace amount of fluorinated Methcathinone (Schedule I)
 6. 1.8 grams of Alprazolam (Schedule IV)
 7. 285 dosage units of Alprazolam (Schedule IV)
 8. 3 dosage units of Alprazolam (Schedule IV)
 9. 4 whole and 1 partial dosage unit of Methylenedioxymethamphetamine (MDMA) and Methylenedioxyamphetamine (MDA) (Schedule I)
 10. 41.90 grams of Pentadone and Etizolam (Schedule I)
 11. 15 dosage units of Alprazolam (Schedule IV)
 12. 30 dosage units of Alprazolam (Schedule IV)
4. Also seized from the residence were prepaid cards in the name of David and Regina COOPER, which were used to help facilitate the purchasing and selling of illegal narcotics. Other items seized were label makers, a heat sealer, a pill press, digital scales, miscellaneous documents related to buying and selling illegal narcotics, empty shipping boxes, empty capsules, shipping labels, and postal tracking receipts.
5. On June 03, 2014, the United States Postal Inspection Service intercepted a package coming from China containing a white substance, which tested positive for Methamphetamine. The package listed the shipper as Xue Ke Fong, [REDACTED], Nan Jing, China. The receiver of the package was listed as David Cooper at [REDACTED], Gulfport, MS 39502. The white substance was sent to the Department of Homeland Security US Customs and Border Protection Laboratories and Scientific Services for testing. Laboratory analysis determined the presence of Pentadone, a scheduled controlled substance (Schedule I): Net weight was 95.6 grams.

6. Based on the aforementioned facts and circumstances, your affiant believes there is probable cause that David COOPER and Regina COOPER have violated Section 846, Title 21, United States Code, conspiracy to possess with intent to distribute Schedule I and IV controlled substances.



Ian Estorffe, Task Force Agent
Department of Homeland Security
Homeland Security Investigations

Sworn and subscribed before me the 28 day of May, 2015.



UNITED STATES MAGISTRATE JUDGE